

COZEN O'CONNOR
Attorneys for Plaintiffs
Michael J. Sommi, Esq. (MS-7910)
45 Broadway, 16th Floor
New York, New York 10006
(212) 509-9400

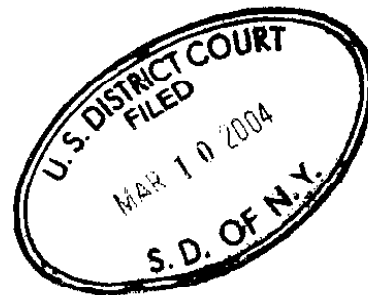
IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACK :
ON SEPTEMBER 11, 2001 : CIVIL ACTION NO.: 03 MD 1570
:

FEDERAL INSURANCE COMPANY; :
PACIFIC INDEMNITY COMPANY; :
CHUBB CUSTOM INSURANCE : CIVIL ACTION NO.: 03 CV 6978
COMPANY; CHUBB INDEMNITY :
INSURANCE COMPANY; CHUBB :
INSURANCE COMPANY OF CANADA; :
CHUBB INSURANCE COMPANY OF :
NEW JERSEY; GREAT NORTHERN :
INSURANCE COMPANY; VIGILANT :
INSURANCE COMPANY; ZURICH :
AMERICAN INSURANCE COMPANY; :
AMERICAN GUARANTEE AND :
LIABILITY INSURANCE COMPANY; :
AMERICAN ZURICH INSURANCE :
COMPANY; ASSURANCE COMPANY :
OF AMERICA; COLONIAL AMERICAN :
CASUALTY AND SURETY :
INSURANCE COMPANY; FIDELITY :
AND DEPOSIT COMPANY OF :
MARYLAND; MARYLAND :
CASUALTY COMPANY; NORTHERN :
INSURANCE COMPANY OF NEW :
YORK; STEADFAST INSURANCE :
COMPANY; VALIANT INSURANCE :
COMPANY; ONE BEACON :
INSURANCE COMPANY; ONE :
BEACON AMERICA INSURANCE :
COMPANY; AMERICAN EMPLOYERS' :
INSURANCE COMPANY; THE :

**FIRST AMENDED
COMPLAINT**

JURY TRIAL DEMANDED



CAMDEN FIRE INSURANCE :
ASSOCIATION; HOMELAND :
INSURANCE COMPANY OF NEW :
YORK; CRUM & FORSTER :
INDEMNITY COMPANY; NORTH :
RIVER INSURANCE COMPANY; :
UNITED STATES FIRE INSURANCE :
COMPANY; AMERICAN :
ALTERNATIVE INSURANCE :
CORPORATION; GREAT LAKES :
REINSURANCE U.K. PLC; AND THE :
PRINCETON EXCESS & SURPLUS :
LINES INSURANCE COMPANY; :
AMLIN UNDERWRITING, LTD.; :
HISCOX DEDICATED CORPORATE :
MEMBER, LTD.; ALLSTATE :
INSURANCE COMPANY; BOSTON :
OLD COLONY INSURANCE :
COMPANY; CONTINENTAL :
INSURANCE COMPANY, :
COMMERCIAL INSURANCE :
COMPANY OF NEWARK, NJ; CNA :
CASUALTY OF CALIFORNIA; :
CONTINENTAL INSURANCE :
COMPANY OF NEW JERSEY; :
FIDELITY AND CASUALTY :
COMPANY OF NEW YORK; GLENS :
FALLS INSURANCE COMPANY; :
NATIONAL BEN FRANKLIN :
INSURANCE COMPANY OF ILLINOIS; :
SENECA INSURANCE COMPANY, :
INC. :

Plaintiffs :

v. :

AL QAIDA; EGYPTIAN ISLAMIC :
JIHAD; ASBAT AL-ANSAR; AL :
GAMA'A AL-ISLAMIYYA; SALAFIST :
GROUP FOR CALL AND COMBAT; :
LASHKAR I JANGHVI; LASHIKAR-E :
TAYYIBA; JEMAAH ISLAMIYA :
ORGANIZATION; HEZBOLLAH; ABU :
SAYEF GROUP; ALGERIAN ARMED :
ISLAMIC GROUP; HAMAS; :

PALESTINE ISLAMIC JIHAD; THE :
 ISLAMIC REPUBLIC OF IRAN; :
 REPUBLIC OF IRAQ; THE REPUBLIC :
 OF THE SUDAN; SYRIAN ARAB :
 REPUBLIC; THE KINGDOM OF SAUDI :
 ARABIA; OSAMA BIN LADEN; :
 MUHAMMAD ATIF A/K/A SUBHI :
 SITTA A/K/A ABU HAFS AL-MASRI; :
 SAYF AL-ADL; SHAYKH SA'ID A/K/A :
 MUSTAFA MUHAMMAD AHMAD; :
 ABU HAFS THE MAURITANIAN A/K/A :
 MAHFOUZ OULD AL-WALID A/K/A :
 KHALID AL-SHANQITI; IBN AL- :
 SHAYKH AL-LIBI; ABU ZUBAYDAH :
 A/K/A ZAYN AL ABIDIN :
 MUHAMMAD HUSAYN TARIQ; ABD :
 AL-HADI AL-IRAQI A/K/A ABU :
 ABDULLAH; AYMAN AL-ZAWAHIRI; :
 THIRWAT SALAH SHIHATA A/K/A :
 MUHAMMAD ALI; TARIQ ANWAR :
 AL-SAYYID AHMAD A/K/A FATHI :
 A/K/A AMR AL-FATHI; MUHAMMAD :
 SALAH A/K/A NASR FAHMI NASR :
 HASANAYN; MAKIITAB AL- :
 KIIDAMAT A/K/A AL-KHIFAF; AL- :
 ITIHAAD AL-ISLAMIYA (AIAI); :
 ISLAMIC ARMY OF ADEN; Wafa :
 HUMANITARIAN ORGANIZATION; :
 AL-RASHID TRUST; MAMOUN :
 DARKAZANLI IMPORT-EXPORT :
 COMPANY; NURJAMAN RIDUAN :
 ISMUDDIN A/K/A HAMBALI; :
 MOHAMMED IQBAL :
 ABDURRAHMAN A/K/A/ ABU JIBRI; :
 BENEVOLENCE INTERNATIONAL :
 FOUNDATION; BENEVOLENCE :
 INTERNATIONAL FUND; BOSANSKA :
 IDEALNA FUTURA; GLOBAL RELIEF :
 FOUNDATION A/K/A FOUNDATION :
 SECOURS MONDIAL; MOUNIR EL :
 MOTASSADEQ; RAMZI BINALSHIBH; :
 ZAKARYA ESSABAR; SAID BAHAJI; :
 TURKISTAN ISLAMIC MOVEMENT; :
 WA'EL HAMZA JULAIDAN A/K/A AL- :
 HASAN AL MADANI; ADEL BEN :
 SOLTANE; NABIL BENATTIA; :

YASSINE CHEKKOURI; RIADH :
 JELASSI; MENDI KAMMOUN; SAMIR :
 KISHIK; TAREK BEN HABIB :
 MAAROUFI; ABDELHALIM :
 REMADNA; MANSOUR THAER; :
 LAZHAR BEN MOHAMMED TLILI; :
 HABIB WADDANI; AKIDA BANK :
 PRIVATE LIMITED; AKIDA :
 INVESTMENT CO. LTD.; NASREDDIN :
 GROUP INTERNATIONAL HOLDING :
 LTD.; NASCO NASREDDIN HOLDING :
 A.S.; NASCOTEX S.A.; NASREDDIN :
 FOUNDATION; BA TAQWA FOR :
 COMMERCE AND REAL ESTATE :
 COMPANY LTD.; MIGA – :
 MALAYSIAN SWISS, GULF AND :
 AFRICAN CHAMBER; GULF CENTER :
 S.R.L.; NASCOSERVICE S.R.L.; NASCO :
 BUSINESS RESIDENCE CENTER SAS :
 DI NASREDDIN AHMED IDRIS EC; :
 NASREDDIN COMPANY NASCO SAS :
 DI AHMED IDRIS NASSNEDDIN EC; :
 NADA INTERNATIONAL ANSTALT; :
 NASREDDIN INTERNATIONAL :
 GROUP LIMITED HOLDING; THE AID :
 ORGANIZATION OF THE ULEMA; :
 AHMED IDRIS NASREDDIN; YOUSSEF :
 NADA; ABDELKADIR MAHMOUD ES :
 SAYED; KHALID AL-FAWAZ; ABU :
 HAMZA AL-MASRI; MOHAMED BEN :
 BELGACEM AOUADI; MOKHTAR :
 BOUGHOUGHIA; TAREK CHARAABI; :
 SAMI BEN KHEMAIS ESSID; LASED :
 BEN HENI; SOMALIA BRANCH OF :
 THE AL-HARAMAIN ISLAMIC :
 FOUNDATION; BOSNIA- :
 HERZEGOVINA BRANCH OF AL- :
 HARAMAIN ISLAMIC FOUNDATION; :
 UMMA TAMEER-E-NAU (UTN); :
 BASHIR-UD-DIN MAHMOOD; ABDUL :
 MAJEED; S.M. TUFAIL; AL- :
 BARAKAAT; AL TAQWA/NADA :
 GROUP; AARAN MONEY WIRE :
 SERVICE, INC.; AL BARAKA :
 EXCHANGE LLC; AL BARAKAAT :
 BANK; AL-BARAKAT BANK OF :

SOMALIA (BSS); AL-BARAKAT :
 FINANCE GROUP; AL-BARAKAT :
 FINANCIAL HOLDING CO.; AL- :
 BARAKAT GLOBAL :
 TELECOMMUNICATIONS; AL- :
 BARAKAT GROUP OF COMPANIES :
 SOMALIA LIMITED; AL-BARAKAT :
 INTERNATIONAL A/K/A BARACO CO; :
 AL-BARAKAT INVESTMENTS; AL- :
 BARAKAT WIRING SERVICE; AL :
 TAQWA TRADE, PROPERTY AND :
 INDUSTRY COMPANY LIMITED; :
 ASAT TRUST; BANK AL TAQWA :
 LIMITED; BARAKA TRADING :
 COMPANY; BARAKAAT BOSTON; :
 BARAKAAT CONSTRUCTION :
 COMPANY; BARAKAAT :
 ENTERPRISE; BARAKAAT GROUP OF :
 COMPANIES; BARAKAAT :
 INTERNATIONAL; BARAKAAT :
 INTERNATIONAL FOUNDATION; :
 BARAKAAT INTERNATIONAL, INC.; :
 BARAKAAT NORTH AMERICA, INC.; :
 BARAKAAT RED SEA :
 TELECOMMUNICATIONS; :
 BARAKAAT TELECOMMUNICATIONS :
 CO. SOMALIA; BARAKAT BANK AND :
 REMITTANCES; BARAKAT :
 COMPUTER CONSULTING (BCC); :
 BARAKAT CONSULTING GROUP :
 (BCG); BARAKAT GLOBAL :
 TELEPHONE COMPANY; BARAKAT :
 INTERNATIONAL COMPANIES :
 (BICO); BARAKAT POST EXPRESS :
 (BPE); BARAKAT REFRESHMENT :
 COMPANY; BARAKAT WIRE :
 TRANSFER COMPANY; BARAKAT :
 TELECOMMUNICATIONS COMPANY :
 LIMITED (BTCLCO); BARAKO :
 TRADING COMPANY, LLC; GLOBAL :
 SERVICES INTERNATIONAL; :
 HEYATUL ULYA; NADA :
 MANAGEMENT ORGANIZATION; :
 PARKA TRADING COMPANY; RED :
 SEA BARAKAT COMPANY LIMITED; :
 SOMALIA INTERNATIONAL RELIEF :

ORGANIZATION; SOMALIA :
 INTERNET COMPANY; SOMALIA :
 NETWORK AB; YOUSSEF M. NADA & :
 CO. GESELLSCHAFT MBH; YOUSSEF :
 M. NADA; HUSSEIN MAHMUD :
 ABDULLKADIR; ABDIRASIK ADEN; :
 ABBAS ABDI ALI; ABDI ADULAZIZ :
 ALI; YUSAF AHMED ALI; DAHIR :
 UBEIDULLAHI AWEYS; HASSAN :
 DAHIR AWEYS; GARAD JAMA; ALI :
 GHALEB HIMMAT; ALBERT :
 FREDRICH ARMAND HUBER; LIBAN :
 HUSSEIN; AHMED NUR ALI JIM'ALE; :
 ABDULLAHI HUSSEIN KAHIE; :
 MOHAMMED MANSOUR; ZEINAB :
 MANSOUR-FATTAH; ABDULLAH :
 AHMED ABDULLAH A/K/A ABU :
 MARIAM A/K/A ABU MOHAMED AL- :
 MASRI A/K/A SALEH; HAJI ABDUL :
 MANAN AGHA A/K/A ABD AL- :
 MAN'AM SAIYID; AL-HAMATI :
 SWEETS BAKERIES; MUHAMMAD :
 AL-HAMATI A/K/A MOHAMMAD :
 HAMD I SADIQ AL-AHDAL A/K/A ABU :
 ASIM AL-MAKKI; AMIN AL-HAQ :
 A/K/A DR. AMIN AH HAQ A/K/A :
 MUHAMMAD AMIN A/K/A DR. AMIN :
 UL-HAQ; SAQAR AL-SADAWI; :
 AHMAD SA'ID AL-KADR A/K/A ABU :
 ABD AL-RAHMAN AL-KANADI; :
 ANAS AL-LIBY A/K/A ANAS AL-LIBI :
 A/K/A NAZIM AL-RAGHIE A/K/A :
 NAZIH ABDUL HAMED AL-RAGHIE :
 A/K/A ANAS AL-SABAI; AHMAD :
 IBRAHIM AL- MUGHASSIL A/K/A :
 ABU OMRAN A/K/A AHMED :
 IBRAHIM AL-MUGHASSIL; :
 ABDELKARIM HUSSEIN MOHAMED :
 AL-NASSER; AL-NUR HONEY PRESS :
 SHOPS A/K/A AL-NUR HONEY :
 CENTER; YASIN AL-QADI A/K/A :
 SHAYKH YASSIN ABDULLAH KADI :
 A/K/A YASIN KATIDI; SA'D AL- :
 SHARIF; AL-SHIFA' HONEY PRESS :
 FOR INDUSTRY AND COMMERCE; :
 IBRAHIM SALIH MOHAMMED AL- :

YACoub; AHMED MOHAMMED :
 HAMED ALI A/K/A AHMED :
 MOHAMMED ABDUREHMAN A/K/A :
 ABU FATIMA A/K/A ABU ISLAM :
 A/K/A ABU KHADIJAH A/K/A :
 AHMED HAMED A/K/A AHMED THE :
 EGYPTIAN A/K/A AHMED AHMED :
 A/K/A AHAMAD AL-MASRI A/K/A :
 ABU ISLAM AL-SURIR A/K/A AHMED :
 MOHAMMED ALI A/K/A HAMED ALI :
 A/K/A AHMED HEMED A/K/A AHMED :
 SHIEB A/K/A SHUAIB; ALI ATWA :
 A/K/A AMMAR MANSOUR BOUSLIM :
 A/K/A HASSAN ROSTOM SALIM; :
 MUHSIN MUSA MATWALLI ATWAH :
 A/K/A ABDEL RAHMAN A/K/A :
 ABDUL RAHMAN A/K/A ABDUL :
 RAHMAN AL-MUHAJIR A/K/A :
 MOHAMMED K.A. AL-NAMER; BILAL :
 BIN MARWAN; AYADI CHAFIQ BIN :
 MUHAMMAD A/K/A BEN :
 MUHAMMAD ALADI A/K/A BEN :
 MUHAMMAD ALADY A/K/A BEN :
 MUHAMMAD AYADI CHAFIK A/K/A :
 BEN MUHAMMAD AYADI SHAFIQ; :
 MAMOUN DARKAZANLI; ALI SAED :
 BIN ALI EL-HOORIE A/K/A ALI SAED :
 BIN ALI AL-HOURI A/K/A ALI SAED :
 BIN ALI EL-HOURI; MUSTAFA :
 MOHAMED FADHIL A/K/A ABD AL :
 WAKIL AL MASRI A/K/A ABU AL- :
 NUBI A/K/A HASSAN ALI A/K/A ABU :
 ANIS A/K/A MOUSTAFA ALI ELBISHY :
 A/K/A MUSTAFA MUHAMAD FADIL :
 A/K/A MUSTAFA FAZUL A/K/A :
 HUSSEIN A/K/A ABU JIHAD A/K/A :
 KHALID A/K/A NU MAN A/K/A :
 MUSTAFA MOHAMMED A/K/A ABU :
 YUSSRR; AHMED KHALFAN :
 GHAILANI A/K/A AHMED THE :
 TANZANIAN A/K/A FOOPIE A/K/A :
 FUPI A/K/A ABU BAKR AHMAD A/K/A :
 A. AHMED A/K/A ABUBAKAR :
 AHRMED A/K/A ABUBAKAR K. :
 AHMED A/K/A ABUBAKAR KHALFAN :
 AHMED A/K/A ABUBAKARY K. :

AHMED A/K/A AHMED KHALFAN :
 AHMED A/K/A AHMAD AL TANZANI :
 A/K/A AHMED KHALFAN ALI A/K/A :
 ABU BAKR A/K/A ABUBAKARY :
 KHALFAN AHMED GHAILANI A/K/A :
 AMMED GHAILANI A/K/A AHMAD :
 KHALAFAN GHILANI A/K/A :
 MAHAFUDH ABUBAKAR AHMED :
 ABDALLAH HUSSEIN A/K/A ABU :
 KHABAR A/K/A AHMED KHALFAN :
 A/K/A SHARIFF OMAR MOHAMMED; :
 RIAD HIJAZI A/K/A ABU-AHMAD AL- :
 AMRIKI A/K/A ABU-AHMAD AL- :
 HAWEN A/K/A RASHID AL- :
 MAGHRIBI A/K/A ABU-AHMAD AL- :
 SHAHID A/K/A M RAED HIJAZI; :
 HASAN IZZ-AL-DIN A/K/A AHMED :
 GARBAYA A/K/A SA-ID A/K/A SAMIR :
 SALWWAN; JAISH-I-MOHAMMED :
 A/K/A ARMY OF MOHAMMED; :
 JAM'YAH TA'AWUN AL-ISLAMIA :
 A/K/A JAM'IYAT AL TA'AWUN AL :
 ISLAMIYYA A/K/A JIT A/K/A :
 SOCIETY OF ISLAMIC :
 COOPERATION; MUFTI RASHID :
 AHMAD LADEHYANOY A/K/A MUFTI :
 RASHEED AHMA A/K/A MUFTI :
 RASHID AHMAD LUDHIANVI A/K/A :
 MUFTI RASHID AHMAD :
 WADEHYANOY; FAZUL ABDULLAH :
 MOHAMMED A/K/A FAZUL :
 ABDALLA A/K/A FAZUL ADBALLAH :
 A/K/A ABU AISHA A/K/A ABU SEIF :
 AL SUDANI A/K/A FADEL :
 ABDALLAH MOHAMMED ALI A/K/A :
 ABDALLA FAZUL A/K/A ABDALLAH :
 FAZUL A/K/A ABDALLAH :
 MOHAMMED FAZUL A/K/A HAROON :
 FAZUL A/K/A HARUN FAZUL A/K/A :
 HAROON A/K/A FADHIL HAROUN :
 A/K/A HARUN A/K/A ABU LUQMAN :
 A/K/A FAZUL MOHAMMED A/K/A :
 FAZUL ABDILAH MOHAMMED :
 A/K/A FOUAD MOHAMMED A/K/A :
 FADIL ABDALLAH MUHAMAD; :
 KHALID SHAIKH MOHAMMED A/K/A :

SALEM ALI A/K/A FAHD BIN :
 ABDALLAH BIN KHALID A/K/A :
 ASHRAF REFAAT NABITH HENIN :
 A/K/A KHALID ADBUL WADOOD; :
 FAHID MOHAMMED ALLY MSALAM :
 A/K/A USAMA AL-KINI A/K/A FAHID :
 MOHAMMED ALLY A/K/A FAHAD :
 ALLY MSALAM A/K/A FAHID :
 MOHAMMED ALI MSALAM A/K/A :
 MOHAMMED ALLY MSALAM A/K/A :
 FAHID MOHAMMED ALI MUSALAAM :
 A/K/A FAHID MUHAMAD ALI SALEM; :
 RABITATRUST; ANSAR AL-ISLAM :
 (AI) A/K/A JUND AL-ISLAM; YOUSSEF :
 ABDAOUI A/K/A ABU ABDULLAH :
 A/K/A ABDELLAH A/K/A ABDULLAH; :
 MOHAMMED AMINE AKLI A/K/A :
 SAMIR A/K/A KALI SAMI A/K/A :
 ELIAS; MOHIREZ AMDOUNI A/K/A :
 FABIO FUSCO A/K/A MOHAMMED :
 HASSAN A/K/A TUALE ABU; CHIEB :
 BEN MOHAMED AYARI A/K/A ABU :
 HOHEM HICHEM; MONDHER :
 BAAZAOUI A/K/A HAMZA; LIONEL :
 DUMONT A/K/A BILAL A/K/A HAMZA :
 A/K/A JACQUES BROUGERE; :
 MOUSSA BEN AMOR ESSAADI A/K/A :
 DAH DAH A/K/A ABDELRAHIMMAN :
 A/K/A BECHIR; RACHID FEHAR A/K/A :
 AMINEDEL BELGIO A/K/A DJAFFAR; :
 BRAHIM BEN HEDILI HAMAMI; :
 KHALIL JARRAYA A/K/A KHALIL :
 YARRAYA A/K/A AZIZ BEN NARVAN :
 ABDEL' A/K/A AMRO A/K/A OMAR :
 A/K/A AMROU A/K/A AMR; MOUNIR :
 BEN HABIB JERRAYA A/K/A :
 YARRAYA; FOUZI JENDOUBI A/K/A :
 SAID A/K/A SAMIR; FETHI BEN :
 REBAI MASRI A/K/A AMOR A/K/A :
 OMAR ABU A/K/A FETHI ALIC; NAJIB :
 OUAZ; AHMED HASNI RARRBO :
 A/K/A ABDALLAH A/K/A ABDULLAH; :
 NEDAL SALEH A/K/A HITEM; :
 ABDELGHANI MZOUZI; GULBUDDIN :
 HEKMATYAR; IMAD MUGHINIYEI; :
 MUHAMMAD OMAR; ISLAMIC :

INTERNATIONAL BRIGADE; SPECIAL :
 PURPOSE ISLAMIC REGIMENT; :
 RIYADUS-SALIKHIN RECOGNIZANCE :
 AND SABOTAGE BATTALION OF :
 CHECHEN MARTYRS; PRINCESS :
 HAIFA AL-FAISAL; PRINCE BANDAR :
 BIN SULTAN BIN ABDULAZIZ AL :
 SAUD; OSAMA BASSNAN; OMAR AL- :
 BAYOUMI; FAHAD AL-THUMAIRY; :
 WORLD ASSEMBLY OF MUSLIM :
 YOUTH; SHEIKH AHMED SALIM :
 SWEDAN; MUHAMMAD ABU-ISLAM; :
 ABDULLAH QASSIM; HASIIM :
 ABDULRAHMAN; JAMAL AL- :
 BADAWI; MOHAMMED OMAR AL- :
 HARAZI, WALID AL-SOUROURI; :
 FATHIA ADBUL RAHMAN; YASSER :
 AL-AZZANI; JAMAL BA KHORSH; :
 AHMAD AL-SHINNI; JAMIL QASIM :
 SAEED; ABU ABDUL RAHMAN; :
 MOHAMED BAYAZID; ABU MUSAB :
 ZARQAWI; SHEIKH OMAR BAKRI :
 MUHAMMAD; ABDUL FATTAH :
 ZAMMAR; GHASOUB AL ABRASH :
 GHALYOUN A/K/A ABU MUSAB; :
 BENSAYAH BELKACEM; SABIR :
 LAMAR; WADH EL-HAGE; WALI :
 KHAN AMIN SHAH; ZACARIAS :
 MOUSSAOUI; THE TALIBAN; :
 MAULVI ABDUL KABIR; JALIL :
 SHINWARI; NOOR JALIL; ABDEL :
 HUSSEIN; ADU AGAB; NATIONAL :
 ISLAMIC FRONT; HASSAN TURABI; :
 ISS EL-DIN EL SAYED; LASHKAR :
 REDAYAN-E-ISLAMI; AHMAD SALAH :
 A/K/A SALIM; ABD AL-MUSHIN AL- :
 LIBI; ABDUL RAHMAN KHALED BIN :
 MAHFOUZ; ABDUL RAHMAN YASIN; :
 ABDULLA AL OBAID; ABDULA BIN :
 LADEN; ADVICE AND :
 REFORMATION COMMITTEE; :
 AFGHAN SUPPORT COMMITTEE; AL :
 KHALEEJIA FOR EXPORT :
 PROMOTION AND MARKETING :
 COMPANY; AL-HARAMAIN A/K/A :
 AL-HARAMAIN FOUNDATION; :

ENAAM M. ARNANOUT; :
 INTERNATIONAL DEVELOPMENT :
 FOUNDATION; INTERNATIONAL :
 ISLAMIC RELIEF ORGANIZATION, :
 INTERNATIONAL INSTITUTE OF :
 ISLAMIC THOUGHT; ISLAMIC :
 CULTURAL INSTITUTE OF MILAN; :
 JAMAL BARZINJI; KHALED BIN :
 MAHFOUZ; MOHAMMED JAMAL :
 KHALIFA; MOHAMMED SALIM BIN :
 MAHFOUZ; MUSLIM WORLD :
 LEAGUE; NATIONAL COMMERCIAL :
 BANK; PRINCE NAYEF BIN :
 ABDULAZIZ AL SAUD; PRINCE :
 SULTAN BIN ABDULAZIZ AL SAUD; :
 RABII HADDAD; SAAR :
 FOUNDATION; SAUDI SUDANESE :
 BANK; AL SHAMAL ISLAMIC BANK; :
 SHEIKH ABU BDUL AZIZ NAGI; :
 SHEIK ADIL GALIL BATARGY A/K/A :
 ADEL ABDUL JALIL BATTERJEE; :
 SULEIMAN ABDEL AZIZ AL RAJHI; :
 TABA INVESTMENTS; TANZANITE :
 KING; ULEMA UNION OF :
 AFGHANISTAN; WADI AL AQIQ; :
 INFOCUS TECH OF MALAYSIA; :
 YAZID SUFAAT OF KUALA LUMPUR :
 MALAYSIA; AL-SHAYKH AL-IRAQI; :
 AZZAM SERVICE CENTER; ABU :
 HAJER AL IRAQI; MOHAMMED AL :
 FAISAL AL SAUD; AL-HIJRAH :
 CONSTRUCTION AND :
 DEVELOPMENT LIMITED; GUM :
 ARABIC COMPANY LIMITED; AL :
 SHAMAL FOR INVESTMENT AND :
 DEVELOPMENT; SALEH ABDULLAH :
 KAMEL; AL BARAKA INVESTMENT :
 AND DEVELOPMENT; SAUDI :
 DALLAH AL BARAKA GROUP LLC; :
 ISLAMIC INVESTMENT COMPANY OF :
 THE GULF; DAR-AL-MAAL AL :
 ISLAMI; AL-BIR SAUDI :
 ORGANIZATION; MOHAMMAD S. :
 MOHAMMAD; TADAMON ISLAMIC :
 BANK; MUSTASIM ABDEL-RAHIM; :
 NATIONAL FUND FOR SOCIAL :

INSURANCE; ABDUL-RAHIM :
 MOHAMMED HUSSEIN; AL AMN AL- :
 DAKHILI; AL AMN AL-KHARIJI; ABD :
 AL SAMAD AL-TA'ISHI; MOHAMED :
 SADEEK ODEH; ABDEL BARRY; :
 AHMAD SALAH A/K/A SALIM; :
 MAHDI CHAMRAN SAVEH; :
 MOHAMMED SARKAWI; AL TAWHID; :
 HAJI MOHAMAD AKRAM; :
 ABDALLAH OMAR; UMAR FARUQ; :
 ABD AL-RAHIM AL-NASHIRI; TURKI :
 AL FAISAL AL SAUD A/K/A PRINCE :
 TURKI; PRINCE ABDULLAH AL :
 FAISAL BIN ABDULAZIZ AL SAUD :
 A/K/A PRINCE ABDULLAH; PRINCE :
 SALMAN BIN ABDUL AZIZ AL SAUD :
 A/K/A PRINCE SALMAN; ZOUAYDI :
 A/K/A MUHAMMED GALEB KALAJE :
 ZOAAAYDI A/K/A ABU TALHA; :
 MULLAH KAKSHAR; ABDULAZIZ :
 BIN ABDUL RAHMAN AL SAUD; :
 ARAFAT EL-ASAH; HAYDAR :
 MOHAMED BIN LADEN; :
 MOHAMMED BIN ABDULRAHMAN :
 AL ARIEFY; FAISAL GROUP :
 HOLDING COMPANY; AL FAISALIAH :
 GROUP; BASHISH HOSPITAL; :
 MUSHAYT FOR TRADING :
 ESTABLISHMENT; ABDULLAH BIN :
 ABDUL MUHSEN AL TURKI A/K/A AL :
 TURKI; SAUDI HIGH COMMISSION :
 A/K/A THE SAUDI HIGH RELIEF :
 COMMISSION; ABDUL AZIZ AL :
 IBRAHIM A/K/A AL IBRAHIM; TAREK :
 AYOUBI; AL ANWA; HELP AFRICAN :
 PEOPLE; IBRAHIM BIN ABDUL AZIZ :
 AL IBRAHIM FOUNDATION; MERCY :
 INTERNATIONAL RELIEF AGENCY; :
 ISLAMIC MOVEMENT OF :
 UZBEKISTAN; SAUDI BIN LADEN :
 GROUP; BAKR M. BIN LADEN; :
 SALEM BIN LADEN; SALEH GAZAZ; :
 MOHAMMED BAHARETH; :
 ABDULLAH BIN SAID; MOHAMMED :
 NUR RAHMI; TAREK M. BIN LADEN; :
 OMAR M. BIN LADEN; MOHAMMED :

BIN LADEN ORGANIZATION; SAUDI :
 BIN LADEN INTERNATIONAL :
 COMPANY; YESLAM M. BIN LADEN; :
 GLOBAL DIAMOND RESOURCE; :
 HUMAN CONCERN INTERNATIONAL :
 SOCIETY; TALAL MOHAMMED :
 BADKOOK; DR. MOHAMMAN ALI :
 ELGARI; NEW DIAMOND HOLDINGS; :
 M.M. BADKOOK COMPANY FOR :
 CATERING & TRADING; AL- :
 MUSTAQBAL GROUP; NATIONAL :
 MANAGEMENT CONSULTANCY :
 CENTER; AL-RAJHI BANKING & :
 INVESTMENT CORPORATION; SALEH :
 ABDULAZIZ AL-RAJHI; ABDULLAH :
 SULAIMAN AL-RAJHI, KHALID :
 SULAIMAN AL-RAJHI; AL-WATANIA :
 POULTRY; MAR-JAC POULTRY; MAR- :
 JAC INVESTMENTS, INC.; PIEDMONT :
 POULTRY; SALIM BIN MAHFOUZ; :
 SNCB CORPORATE FINANCE :
 LIMITED; SNCB SECURITIES LIMITED :
 IN LONDON; SNCB SECURITIES :
 LIMITED IN NEW YORK; SAUDI :
 ECONOMIC AND DEVELOPMENT :
 COMPANY; ZAKAT COMMITTEE; :
 RED CRESCENT SAUDI COMMITTEE; :
 BLESSED RELIEF (MUWAFaq) :
 FOUNDATION; ABDULKARIM :
 KHALED UUSUF ABDULLA; :
 ABDULRAHMAN BIN KHALID BIN :
 MAHFOUZ; AL-BIRR; HISHAM; HEZB- :
 E-ISLAMI; SAIF AL ISLAM EL :
 MASRY; SYED SULEMAN AHMER; :
 MAZIN M.H. BAHARETH; SHAHIR :
 ABDULRAOOF BATTERJEE; ZAHIR H. :
 KAZMI; MUZAFFAR KHAN; SOLIMAN :
 J. KHUDEIRA; JAMAL NYRABEH; :
 AHMAD AJAJ; SUCCESS :
 FOUNDATION; ABDULRAHMAN :
 ALAMOUDI; AMERICAN MUSLIM :
 FOUNDATION; MOHAMMED :
 OMEISH; ADNAN BASHA; MAHMOUD :
 JABALLAH; ARAFAT EL-ASHI; MORO :
 ISLAMIC LIBERATION FRONT; :
 JAMAL AHMED MOHAMMED; :

MOHAMMED KHATIB; SAUDI JOINT :
 RELIEF COMMITTEE; TAIBAH :
 INTERNATIONAL AID ASSOCIATION; :
 ISLAMIC AFRICAN RELIEF AGENCY; :
 TARIK HAMDI; FAZEH AHED; :
 SANABIL AL-KHAIR; SANA-BELL, :
 INC.; SANABEL AL-KHEER, INC.; :
 KHALED NOURI; ABDULLAH M. AL- :
 MAHDI; TAREQ M. AL-SWAIDAN; :
 ABDUL AL-MOSLAH; SALAH :
 BADAHDH; HASSAN A.A. :
 BAHFZALLAH; M. YAQUB MIRZA; :
 HAB AB ALI; SAMIR SALAH; IBRAHIM :
 HASSABELLA; HISHAM AL-TALIB; :
 ABU SULAYMAN; AHMED TOTONJI; :
 IQBAL YUNUS; M. OMAR ASHRAF; :
 MOHAMMED JAGHILIT; MUHAMMAD :
 ASHRAF; SHERIF SEDKY; AFRICAN :
 MUSLIM AGENCY; ARADI, INC.; :
 GROVE CORPORATE, INC.; :
 HERITAGE EDUCATION TRUST; :
 MENA CORPORATION; RESTON :
 INVESTMENTS, INC.; SAFA TRUST; :
 STERLING CHARITABLE GIFT FUND; :
 STERLING MANAGEMENT GROUP; :
 YORK FOUNDATION; NATIONAL :
 DEVELOPMENT BANK; DALLAH :
 AVCO TRANS ARABIA CO. LTD.; :
 OMAR AL BAYOUMI A/K/A ABU :
 IMARD; MASJED AL MADINAH AL :
 MUNAWARAH A/K/A MASJID AL :
 MADINAH AL MUNAWARAH; AQSA :
 ISLAMIC BANK; AQEEL AL-AQEEL; :
 MANSOURI AL-KADI; SOLIMAN H.S. :
 AL-BUTHE; PEROUZ SEDA GHATY; :
 AHMED IBRAHIM AL NAJJAR; ADEL :
 MUHAMMAD SADIQ BIN KAZEM; :
 SAUDI AMERICAN BANK; :
 ABDULAZIZ BIN HAMAD; KHALIL A. :
 KORDI; RASHID M. AL ROMAIZAN; :
 ABDULAZIZ BIN HAMAD AL :
 GOSAIBI; SAUDI CEMENT COMPANY :
 IN DAMMAN; OMAR SULAIMAN AL- :
 RAJHI; ARAB CEMENT COMPANY; :
 ZEINAB MANSOUR-FATTOUH; :
 MOHAMMED CHEHADE; HAZEM :

RAGAB; MOHAMMED ALCHURBAJI; :
 MUSTAFA AL-KADIR; ABU AL-MAID; :
 AL SHAMAL ISLAMIC BANK A/K/A :
 SHAMEL BANK A/K/A BANK EL :
 SHAMAR; SULAIMAN AL-ALI; :
 KHALED NOURI; MUSLIM WORLD :
 LEAGUE OFFICES; ABDULLAH BIN :
 SALEH AL-OBAID; TAHA JABER AL- :
 ALWANI; INTERNATIONAL :
 INSTITUTE OF ISLAMIC THOUGHT; :
 IBRAHIM S. ABDULLAH; :
 MOHAMMED BIN FARIS; DR. :
 MAHMOUD DAKHIL; MOHAMMED :
 AL FAISAL AL SAUD; ABDUL :
 RAHMAN AL SWAILEM; DELTA OIL :
 COMPANY; NIMIR, LLC; ARAB BANK, :
 PLC; DUBAI ISLAMIC BANK; NADA :
 MANAGEMENT ORGANIZATION, SA; :
 ARY GROUP; ISLAMIC CULTURAL :
 CENTER OF GENEVA; HANI :
 RAMADAN; THE COMMITTEE FOR :
 THE DEFENSE OF LEGITIMATE :
 RIGHTS; PROYECTOS Y :
 PROMOCIONES ISO; AFAMIA, SL; :
 COBIS; ABRASH COMPANY; :
 PROMOCIONES Y CONSTRUCCIONES :
 TETUAN PRICOTE, S.A.; CONTRATAS :
 GIOMA; EUROCOVIA OBRAS, S.A.; :
 PROYECTOS Y PROMOCIONES :
 PARADISE, S.L.; PROYECTOS EDISPAN; :
 GHASOUB AL ABRASH; MUSTAF :
 AHMED AL-HISAWI A/K/A SHEIK :
 SAEED; IMAD EDDIN BARAKAT :
 YARKAS A/K/A ABU DAHDAH; :
 MUHAMMED GALEB KALAJE :
 ZUOYADI A/K/A ABU TALHA; :
 BASSAM DALATI SAUT; :
 ABDALRAHMAN ALARNOUT ABU :
 ALJER A/K/A ABU OBED; :
 MOHAMMED KHAIR AL SAQQA :
 A/K/A ABU AL DARDA; GHASOUB AL :
 ABRASH GHALYOUN A/K/A ABU :
 MUSAB; MOHAMMED ALI SAYED :
 MUSHAYT; MOHAMMED HUSSEIN :
 AL-AMOUDI; ABU QATADA AL- :
 FILISTINI A/K/A ABU ISMAIL A/K/A :

ABU UMAR A/K/A ABU OMAR OMAR :
 A/K/A ABU UMAR TAKFIRI A/K/A :
 ABU UMAR UMAR A/K/A ALI- :
 SAMMAN UTHMAN A/K/A OMAR :
 MAHMOUD UTHMAN A/K/A UMAR :
 UTHMAN; YASSIR AL-SIRRI A/K/A :
 AMMAR; MOHAMMED AL MASSARI; :
 LUJAIN AL-IMAN; ZIYAD KHAEEL; :
 IBRAHIM BAH; ABU ZUBAYDAH; :
 MAMDOUH MAHMUD SALIM A/K/A :
 ABU HAJER AL IRAQI; SHEIKH :
 ABDULLAH AZZAM A/K/A ABU :
 MUHAMMED; ABDULLAH SAMIL :
 BAHMADAN; ESSAM AL RIDI; OMAR :
 ABU OMAR; MOHAMMED ALI :
 HASAN AL MOAYAD; AL FAROOQ :
 MOSQUE; YOUSEF JAMEEL; :
 IBRAHIM MUHAMMED AFANDI; :
 MOHAMMED BIN ABDULLAH AL- :
 JOMAITI; ABDULRAHMAN HASSAN :
 SHARBATLY; SALAHUDDIN :
 ABDULJAWAD; AHMED ZAKI :
 YAMANI; AHMAD AL HARBI; :
 MOHAMMED AL-ISSAI; HAMAD :
 HUSSAINI; ABU RIDA AL SURI A/K/A :
 MOHAMMED LOAY BAYAZID; SAUDI :
 RED CRESCENT; AHMED BRAHIM; :
 ABU MUSAB AL-ZARQAWI; ABU :
 IBRAHIM AL-MASRI; DAR AL MAAL :
 AL ISLAMI TRUST; DMI :
 ADMINISTRATIVE SERVICES, S.A.; :
 ISLAMIC ASSEMBLY OF NORTH :
 AMERICA; SALMAN AL-OUDA; :
 SAFAR AL-HAWALI; SALEH AL- :
 HUSSAYEN; SAMI OMAR AL- :
 HUSSAYEN; MUHAMMED J. FAKIH; :
 QUEEN CITY CIGARETTES AND :
 CANDY; AGUS BUDIMAN; AL- :
 BARAKA BANKCORP, INC.; AHMED :
 RESSAM; SAID BAHAJI; ZAKARIYA :
 ESSABAR

Defendants

The above-captioned plaintiffs, by and through their attorneys, Cozen O'Connor, complaining of the above-captioned defendants, do hereby allege the following:

I. PARTIES

1. Plaintiff, Federal Insurance Company ("Federal"), is a corporation organized and existing under the laws of the State of Indiana, with a principal place of business located at 15 Mountain View Road, Warren, New Jersey 07059. At all times material hereto, Federal was engaged in the business of issuing policies of insurance.

2. Plaintiff, Pacific Indemnity Company ("Pacific"), is a corporation organized and existing under the laws of the State of Wisconsin, with a principal place of business located at 330 East Kilbourne Avenue, Suite 1450, Milwaukee, Wisconsin 53202. At all times material hereto, Pacific was engaged in the business of issuing policies of insurance.

3. Plaintiff, Chubb Custom Insurance Company ("Chubb Custom"), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business located at 15 Mountain View Road, Warren, New Jersey 07059. At all times material hereto, Chubb Custom was engaged in the business of issuing policies of insurance.

4. Plaintiff, Chubb Indemnity Insurance Company ("Chubb Indemnity"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 55 Water Street, New York, New York 10041. At all times material hereto, Chubb Indemnity was engaged in the business of issuing policies of insurance.

5. Plaintiff, Chubb Insurance Company of Canada ("CICC"), is a corporation organized and existing under the laws of the Province of Ontario, Canada, with a

principal place of business located at One Financial Plaza, One Adelaide Street East, Floor 16, Toronto, M5C 2V9 Ontario, Canada. At all times material hereto, CICC was engaged in the business of issuing policies of insurance.

6. Plaintiff, Chubb Insurance Company of New Jersey ("CICNJ"), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 15 Mountain View Road, Warren, New Jersey 07059. At all times material hereto, CICNJ was engaged in the business of issuing policies of insurance.

7. Plaintiff, Great Northern Insurance Company ("Great Northern"), is a corporation organized and existing under the laws of the State of Minnesota, with a principal place of business located at 1000 Pillsbury Center, Minneapolis, Minnesota 55402. At all times material hereto, Great Northern was engaged in the business of issuing policies of insurance.

8. Plaintiff, Vigilant Insurance Company ("Vigilant"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 55 Water Street, New York, New York 10038. At all times material hereto, Vigilant was engaged in the business of issuing policies of insurance.

9. Plaintiff, Zurich American Insurance Company ("Zurich"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Zurich was engaged in the business of issuing policies of insurance.

10. Plaintiff, American Guarantee and Liability Insurance Company ("American Guarantee"), is a corporation organized and existing under the laws of the

State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, American Guarantee was engaged in the business of issuing policies of insurance.

11. Plaintiff, American Zurich Insurance Company (“American Zurich”), is a corporation organized and existing under the laws of the State of Illinois, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, American Zurich was engaged in the business of issuing policies of insurance.

12. Plaintiff, Assurance Company of America (“Assurance of America”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Assurance of America was engaged in the business of issuing policies of insurance.

13. Plaintiff, Colonial American Casualty and Surety Insurance Company (“Colonial American”), is a corporation organized and existing under the laws of the State of Maryland, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Colonial American was engaged in the business of issuing policies of insurance.

14. Plaintiff, Fidelity and Deposit Company of Maryland (“Fidelity”), is a corporation organized and existing under the laws of the State of Maryland, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Fidelity was engaged in the business of issuing policies of insurance.

15. Plaintiff, Maryland Casualty Company (“Maryland”), is a corporation organized and existing under the laws of the State of Maryland, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Maryland was engaged in the business of issuing policies of insurance.

16. Plaintiff, Northern Insurance Company of New York (“Northern”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Northern was engaged in the business of issuing policies of insurance.

17. Plaintiff, Steadfast Insurance Company (“Steadfast”), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Steadfast was engaged in the business of issuing policies of insurance.

18. Plaintiff, Valiant Insurance Company (“Valiant”), is a corporation organized and existing under the laws of the State of Iowa, with a principal place of business located at 1400 American Lane, Schaumburg, Illinois 60196. At all times material hereto, Valiant was engaged in the business of issuing policies of insurance.

19. Plaintiff, One Beacon Insurance Company (“One Beacon”), is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, One Beacon was engaged in the business of issuing policies of insurance.

20. Plaintiff, One Beacon America Insurance Company (“One Beacon America”), is a corporation organized and existing under the laws of the Commonwealth

of Massachusetts, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, One Beacon America was engaged in the business of issuing policies of insurance.

21. Plaintiff, American Employers' Insurance Company ("American Employers"), is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, American Employers was engaged in the business of issuing policies of insurance.

22. Plaintiff, The Camden Fire Insurance Association ("Camden"), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, Camden was engaged in the business of issuing policies of insurance.

23. Plaintiff, Homeland Insurance Company of New York ("Homeland"), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at One Beacon Street, Boston, Massachusetts 02108. At all times material hereto, Homeland was engaged in the business of issuing policies of insurance.

24. Plaintiff, Crum & Forster Indemnity Company ("Crum & Forster"), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 305 Madison Avenue, Morristown, New Jersey 07960. At all times material hereto, Crum & Forster was engaged in the business of issuing policies of insurance.

25. Plaintiff, North River Insurance Company (“North River”), is a corporation organized and existing under the laws of the State of New Jersey, with a principal place of business located at 305 Madison Avenue, Morristown, New Jersey 07960. At all times material hereto, North River was engaged in the business of issuing policies of insurance.

26. Plaintiff, United States Fire Insurance Company (“United States Fire”), is a corporation organized and existing under the laws of the State of New York, with a principal place of business located at 395 Madison Avenue, Morristown, New Jersey 07960. At all time material hereto, United States Fire was engaged in the business of issuing policies of insurance.

27. Plaintiff, American Alternative Insurance Corporation (“American Alternative”), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business located at 555 College Road East, Princeton, New Jersey 08543. At all times material hereto, American Alternative was engaged in the business of issuing policies of insurance.

28. Plaintiff, Great Lakes Resinsurance U.K. PLC (“Great Lakes”), is a corporation organized and existing under the laws of the United Kingdom, with a principal place of business located at 1 Minster Court, Mincing Lane, London, England EC3R 7YH. At all times material hereto, Great Lakes was engaged in the business of issuing policies of insurance.

29. Plaintiff, The Princeton Excess & Surplus Lines Insurance Company (“Princeton Excess”), is a corporation organized and existing under the laws of the State of Delaware, with a principal place of business located at 555 College Road East,

Princeton, New Jersey 08543. At all times material hereto, Princeton Excess was engaged in the business of issuing policies of insurance.

30. Plaintiff, Amlin Underwriting Limited (“Amlin”), is a corporation organized and existing under the laws of the United Kingdom, with a principal place of business located at 1 St. Helen’s, 1 Undershaft, London, EC3A 8ND, England. At all times material hereto, Amlin was engaged in the business of issuing policies of insurance.

31. Plaintiff, Hiscox Dedicated Corporate Member Ltd. (“Hiscox”) is a corporation organized and existing under the laws of the United Kingdom, with a principal place of business located at 1 Great St. Helen’s, London, EC3A 6HX, England. At all times material hereto, Hiscox was engaged in the business of issuing policies of insurance.

32. Plaintiff, Allstate Insurance Company (“Allstate”), is a corporation organized and existing under the laws of the state of Illinois, with a principal place of business located at 3075 Sanders Road, Northbrook, IL 60062. At all times material hereto, Allstate was engaged in the business of issuing policies of insurance.

33. Plaintiff, Boston Old Colony Insurance Company (“Old Colony”), is a corporation organized and existing under the laws of the commonwealth of Massachusetts, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Old Colony was engaged in the business of issuing policies of insurance.

34. Plaintiff, Continental Insurance Company (“Continental Insurance”), is a corporation organized and existing under the laws of the state of New Hampshire, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times

material hereto, Continental Insurance was engaged in the business of issuing policies of insurance.

35. Plaintiff, Commercial Insurance Company of Newark, NJ, is a corporation organized and existing under the laws of the state of New Jersey, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Commercial Insurance Company of Newark, NJ was engaged in the business of issuing policies of insurance.

36. Plaintiff, CNA Casualty of California ("CNA Casualty"), is a corporation organized and existing under the laws of the state of California, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, CNA Casualty of California was engaged in the business of issuing policies of insurance.

37. Plaintiff, Continental Insurance Company of New Jersey, is a corporation organized and existing under the laws of the state of New Jersey, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Continental Insurance Company of New Jersey was engaged in the business of issuing policies of insurance.

38. Plaintiff, Fidelity and Casualty Company of New York, is a corporation organized and existing under the laws of the state of New Hampshire, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Fidelity and Casualty Company of New York was engaged in the business of issuing policies of insurance.

39. Plaintiff, Glens Falls Insurance Company ("Glens Falls"), is a corporation organized and existing under the laws of the state of Delaware, with a principal place of

business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Glens Falls was engaged in the business of issuing policies of insurance.

40. Plaintiff, National Ben Franklin Insurance Company of Illinois ("Ben Franklin"), is a corporation organized and existing under the laws of the state of Illinois, with a principal place of business located at CNA Plaza, Chicago, Illinois 60685. At all times material hereto, Ben Franklin was engaged in the business of issuing policies of insurance.

41. Plaintiff Seneca Insurance Company, Inc. ("Seneca"), is a corporation organized and existing under the laws of the state of New York, with a principal place of business located at 160 Water Street, New York, NY 10038. At all times material hereto, Seneca was engaged in the business of issuing policies of insurance.

42. Defendant, al Qaida, is a designated Foreign Terrorist Organization ("FTO"), pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Established by defendant Osama bin Laden in the late 1980's, al Qaida is a global network of several thousand terrorist cells, members, associates and supporters, dedicated to the establishment of a pan-Islamic Caliphate throughout the world. The network's strength is reinforced by its ties to other FTOs, extremist organizations and sympathetic individuals and State Sponsors. Al Qaida frequently functions through, in concert with, or with the support of, the terrorist organizations and groups that operate under its umbrella or with its support. In February 1998, al Qaida issued a *fatwa* under the banner "the World Islamic Front for Jihad Against Jews and Crusaders," saying it was the duty of all Muslims to kill United States citizens - civilian or military - and their allies everywhere.

43. Defendant, Egyptian Islamic Jihad, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Egyptian Islamic Jihad operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida. Ayman al-Zawihiri, a prominent leader of Egyptian Islamic Jihad, has served as a member of al Qaida's leadership council, known as the *shura*, since al Qaida's inception. According to the United States government, Egyptian Islamic Jihad merged with al Qaida at some point prior to June 2001, but retains the capacity to commit acts of international terrorism independently.

44. Defendant, Asbat al-Ansar, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Asbat al-Ansar operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

45. Defendant, Al Gama'a al-Islamiyya, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Al Gama'a al-Islamiyya operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida. A senior official of Al Gama'a al-Islamiyya signed al Qaida's February 1998 *fatwa* calling for attacks against the United States.

46. Defendant, Salafist Group for Call and Combat, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Salafist Group for Call and Combat operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

47. Defendant, Lashkar I Janghvi, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Lashkar I Janghvi operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

48. Defendant, Lashkar-e Tayyiba, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Lashkar-e-Tayyiba operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

49. Defendant, Jemaah Islamiya Organization, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Jemaah Islamiya Organization operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

50. Defendant, Hezbollah, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Hezbollah operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida. The relationship between Hezbollah and al Qaida was forged during meetings between Osama bin Laden and Imad Mughniyah, Hezbollah's chief of operations, and has included coordination on explosives and tactics training, money laundering, weapons smuggling and acquisition of forged identification documents. According to United States intelligence officials, Hezbollah operates under the direction, and by virtue of the direct license, of the Iranian and Syrian governments. Hezbollah is, in effect, an agency and instrumentality of the Iranian and Syrian governments.

51. Defendant, Abu Sayef Group, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Abu Sayef Group operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

52. Defendant, Algerian Armed Islamic Group a/k/a GIA, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Algerian Armed Islamic Group operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

53. Defendant, HAMAS, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. HAMAS operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

54. Defendant, Palestine Islamic Jihad, is a designated FTO, pursuant to §219 of the Immigration and Nationality Act, as amended by the Anti-terrorism and Effective Death Penalty Act of 1996. Palestine Islamic Jihad operates in concert, conspires, exchanges material support and resources, and is otherwise affiliated with al Qaida.

55. Defendant, The Islamic Republic of Iran ("Iran"), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961.

56. Defendant Iran has long provided material support and resources to al Qaida, as further described herein.

57. Defendant, Republic of Iraq ("Iraq"), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961.

58. Defendant Iraq has long provided material support and resources to al Qaida, including training in document forgery, bomb making and poison and gas production, as further described herein.

59. Defendant, The Republic of Sudan ("Sudan"), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961. Sudan maintains an Embassy within the United States at 2210 Massachusetts Avenue, N.W., Washington, D.C. 20008-2831.

60. Defendant Sudan has long provided material support and resources to al Qaida. According to the United States government, Sudan's support of al Qaida has included para-military training, indoctrination, money, travel documentation, safe passage and refuge in Sudan, as further described herein.

61. Defendant, Syrian Arab Republic ("Syria"), is a foreign state within the meaning of 28 U.S.C. §1391(f), and a designated State Sponsor of terrorism pursuant to the Export Administration Act of 1979 and the Foreign Assistance Act of 1961.

62. Defendant Syria has long provided material support and resources to al Qaida, as further described herein.

63. Defendant, Kingdom of Saudi Arabia ("Saudi Arabia"), is a foreign state within the meaning of 28 U.S.C. §1391(f). Saudi Arabia maintains an Embassy within the United States at 601 New Hampshire Avenue, N.W., Washington, D.C. 20037.

64. Defendant Saudi Arabia has long provided material support and resources to al Qaida, including massive financial and logistical assistance, as further described herein.

65. Defendants, Osama bin Laden; Muhammad Atif a/k/a Subhi Sitta a/k/a Abu Hafs al-Masri; Sayf al-Adl; Shaykh Sa'id a/k/a Mustafa Muhammad Ahmad; Abu Hafs the Mauritanian a/k/a Mahfouz Ould al-Walid a/k/a Khalid al-Shanqiti; Ibn al-Shaykh al-Libi; Abu Zubaydah a/k/a Zayn al Abidin Muhammad Husayn Tariq; Abd al-Hadi al-Iraqi a/k/a Abu Abdullah; Ayman al-Zawahiri; Thirwat Salah Shihata a/k/a Muhammad Ali; Tariq Anwar al-Sayyid Ahmad a/k/a Fathi a/k/a Amr al-Fatih; Muhammad Salah a/k/a Nasr Fahmi Nasr Hasanayn; Makhtab al-Khidamat a/k/a Al-Khifaf; Al-Itihaad al-Islamiya (AIAI); Islamic Army of Aden; Wafa Humanitarian Organization; Al-Rashid Trust; Mamoun Darkazanli Import-Export Company; Nurjaman Riduan Ismuddin a/k/a Hambali; Mohammed Iqbal Abdurrahman a/k/a/ Abu Jibril; Benevolence International Foundation; Benevolence International Fund; Bosanska Idealna Futura; Global Relief Foundation a/k/a Foundation Secours Mondial; Mounir El Motassadeq; Ramzi Binalshibh; Zakarya Essabar; Said Bahaji; Turkistan Islamic Movement; Wa'el Hamza Julaidan a/k/a Al-Hasan al Madani; Adel Ben Soltane; Nabil Benattia; Yassine Chekkouri; Riadh Jelassi; Mendi Kammoun; Samir Kishk; Tarek Ben Habib Maaroufi; Abdelhalim Remadna; Mansour Thaer; Lazhar Ben Mohammed Tlili; Habib Waddani; Akida Bank Private Limited; Akida Investment Co. Ltd.; Nasreddin Group International Holding Ltd.; Nasco Nasreddin Holding A.S.; Nascotex S.A.; Nasreddin Foundation; BA Taqwa for Commerce and Real Estate Company Ltd.; Miga - Malaysian Swiss, Gulf and African Chamber; Gulf Center S.R.L.; Nascoservice S.R.L.; Nasco Business Residence Center SAS Di Nasreddin Ahmed Idris EC; Nasreddin

Company Nasco SAS Di Ahmed Idris Nassneddin EC; Nada International Anstalt; Nasreddin International Group Limited Holding; The Aid Organization of the Ulema; Ahmed Idris Nasreddin; Youssef Nada; Abdelkadir Mahmoud Es Sayed; Khalid Al-Fawaz; Abu Hamza Al-Masri; Mohamed Ben Belgacem Aouadi; Mokhtar Boughougha; Tarek Charaabi; Sami Ben Khemais ESSID; Lased Ben Heni; Somalia Branch of the Al-Haramain Islamic Foundation; Bosnia-Herzegovina branch of Al-Haramain Islamic Foundation; Umma Tameer-E-Nau (UTN); Bashir-Ud-Din Mahmood; Abdul Majeed; S.M. Tufail; Al-Barakaat; Al Taqwa/Nada Group; Aaran Money Wire Service, Inc.; Al Baraka Exchange LLC; Al Barakaat Bank; Al-Barakat Bank of Somalia (BSS); Al-Barakat Finance Group; Al-Barakat Financial Holding Co.; Al Barakat Global Telecommunications; Al-Barakat Group of Companies Somalia Limited; Al-Barakat International a/k/a Baraco Co; Al-Barakat Investments; Al-Barakat Wiring Service; Al Taqwa Trade, Property and Industry Company Limited; ASAT Trust; Bank al Taqwa Limited; Baraka Trading Company; Barakaat Boston; Barakaat Construction Company; Barakaat Enterprise; Barakaat Group of Companies; Barakaat International; Barakaat International Foundation; Barakaat International, Inc.; Barakaat North America, Inc.; Barakaat Red Sea Telecommunications; Barakaat Telecommunications Co. Somalia; Barakat Bank and Remittances; Barakat Computer Consulting (BCC); Barakat Consulting Group (BCG); Barakat Global Telephone Company; Barakat International Companies (BICO); Barakat Post Express (BPE); Barakat Refreshment Company; Barakat Wire Transfer Company; Barakat Telecommunications Company Limited (BTCLCO); Barako Trading Company, LLC; Global Services International; Heyatul Ulya; Nada Management Organization; Parka Trading Company; Red Sea Barakat Company Limited; Somalia International Relief Organization; Somalia Internet

Company; Somalia Network AB; Youssef M. Nada & Co. Gesellschaft MBH; Youssef M. Nada; Hussein Mahmud Abdulkadir; Abdirasik Aden; Abbas Abdi Ali; Abdi Adulaziz Ali; Yusaf Ahmed Ali; Dahir Ubeidullahi Aweys; Hassan Dahir Aweys; Garad Jama; Ali Ghaleb Himmat; Albert Fredrich Armand Huber; Liban Hussein; Ahmed Nur Ali Jim'ale; Abdullahi Hussein Kahic; Mohammed Mansour; Zeinab Mansour-Fattah; Abdullah Ahmed Abdullah a/k/a Abu Mariam a/k/a Abu Mohamed Al-Masri a/k/a Saleh; Haji Abdul Manan Agha a/k/a Abd Al-Man'am Saiyid; Al-Hamati Sweets Bakeries; Muhammad Al-Hamati a/k/a Mohammad Hamdi Sadiq Al-Ahdal a/k/a Abu Asim Al-Makki; Amin Al-Haq a/k/a Dr. Amin Ah Haq a/k/a Muhammad Amin a/k/a Dr. Amin Ul-Haq; Saqar Al-Sadawi; Ahmad Sa'Id Al-Kadr a/k/a Abu Abd Al-Rahman Al-Kanadi; Anas Al-Liby a/k/a Anas Al-Libi a/k/a Nazim Al-Raghie a/k/a Nazih Abdul Hamed Al-Raghie a/k/a Anas Al-Sabai; Ahmad Ibrahim Al- Mughassil a/k/a Abu Omran a/k/a Ahmed Ibrahim Al-Mughassil; Abdelkarim Hussein Mohamed Al-Nasser; Al-Nur Honey Press Shops a/k/a Al-Nur Honey Center; Yasin Al-Qadi a/k/a Shaykh Yassin Abdullah Kadi a/k/a Yasin Kahdi; Sa'D Al-Sharif; Al-Shifa' Honey Press for Industry and Commerce; Ibrahim Salih Mohammed Al-Yacoub; Ahmed Mohammed Hamed Ali a/k/a Ahmed Mohammed Abdurehman a/k/a Abu Fatima a/k/a Abu Islam a/k/a Abu Khadiijah a/k/a Ahmed Hamed a/k/a Ahmed the Egyptian a/k/a Ahmed Ahmed a/k/a Ahamad Al-Masri a/k/a Abu Islam Al-Surir a/k/a Ahmed Mohammed Ali a/k/a Hamed Ali a/k/a Ahmed Hamed a/k/a Ahmed Shieb a/k/a Shuaib; Ali Atwa a/k/a Ammar Mansour Bouslim a/k/a Hassan Rostom Salim; Muhsin Musa Matwalli Atwah a/k/a Abdel Rahman a/k/a Abdul Rahman a/k/a Abdul Rahman Al-Muhajir a/k/a Mohammed K.A. Al-Namer; Bilal Bin Marwan; Ayadi Chafiq Bin Muhammad a/k/a Ben Muhammad Aiadi a/k/a Ben Muhammad Aiady a/k/a Ben Muhammad Ayadi Chafik a/k/a Ben Muhammad Ayadi

Shafiq; Mamoun Darkazanli; Ali Saed Bin Ali El-Hoorie a/k/a Ali Saed Bin Ali Al-Houri
a/k/a Ali Saed Bin Ali El-Houri; Mustafa Mohamed Fadhil a/k/a Abd Al Wakil Al Masri
a/k/a Abu Al-Nubi a/k/a Hassan Ali a/k/a Abu Anis a/k/a Moustafa Ali Elbishy a/k/a
Mustafa Muhammad Fadil a/k/a Mustafa Fazul a/k/a Hussein a/k/a Abu Jihad a/k/a Khalid
a/k/a Nu Man a/k/a Mustafa Mohammed a/k/a Abu Yussrr; Ahmed Khalfan Ghailani
a/k/a Ahmed the Tanzanian a/k/a Foopie a/k/a Fupi a/k/a Abu Bakr Ahmad a/k/a A.
Ahmed a/k/a Abubakar Ahmed a/k/a Abubakar K. Ahmed a/k/a Abubakar Khalfan
Ahmed a/k/a Abubakary K. Ahmed a/k/a Ahmed Khalfan Ahmed a/k/a Ahmad Al
Tanzani a/k/a Ahmed Khalfan Ali a/k/a Abu Bakr a/k/a Abubakary Khalfan Ahmed
Ghailani a/k/a Ammed Ghailani a/k/a Ahmad Khalafan Ghilani a/k/a Mahafudh
Abubakar Ahmed Abdallah Hussein a/k/a Abu Khabar a/k/a Ahmed Khalfan a/k/a Shariff
Omar Mohammed; Riad Hijazi a/k/a Abu-Ahmad Al-Amriki a/k/a Abu-Ahmad Al-
Hawen a/k/a Rashid Al-Maghribi a/k/a Abu-Ahmad Al-Shahid a/k/a M Raed Hijazi;
Hasan Izz-Al-Din a/k/a Ahmed Garbaya a/k/a Sa-Id a/k/a Samir Salwwan; Jaish-I-
Mohammed a/k/a Army of Mohammed; Jam'Yah Ta'Awun Al-Islamia a/k/a Jam'Iyat Al
Ta'Awun Al Islamiyya a/k/a JIT a/k/a Society of Islamic Cooperation; Mufti Rashid
Ahmad Ladehyanoy a/k/a Mufti Rasheed Ahma a/k/a Mufti Rashid Ahmad Ludhianvi
a/k/a Mufti Rashid Ahmad Wadehyanoy; Fazul Abdullah Mohammed a/k/a Fazul
Abdalla a/k/a Fazul Adballah a/k/a Abu Aisha a/k/a Abu Seif Al Sudani a/k/a Fadel
Abdallah Mohammed Ali a/k/a Abdalla Fazul a/k/a Abdallah Fazul a/k/a Abdallah
Mohammed Fazul a/k/a Haroon Fazul a/k/a Harun Fazul a/k/a Haroon a/k/a Fadhil
Haroun a/k/a Harun a/k/a Abu Luqman a/k/a Fazul Mohammed a/k/a Fazul Abdilahi
Mohammed a/k/a Fouad Mohammed a/k/a Fadil Abdallah Muhammad; Khalid Shaikh
Mohammed a/k/a Salem Ali a/k/a Fahd Bin Abdallah Bin Khalid a/k/a Ashraf Refaat

Nabith Henin a/k/a Khalid Abdul Wadood; Fahid Mohammed Ally Msalam a/k/a Usama Al-Kini a/k/a Fahid Mohammed Ally a/k/a Fahad Ally Msalam a/k/a Fahid Mohammed Ali Msalam a/k/a Mohammed Ally Msalam a/k/a Fahid Mohammed Ali Musalaam a/k/a Fahid Muhamad Ali Salem; RabitaTrust; Ansar al-Islam (AI) a/k/a Jund al-Islam; Youssef Abdaoui a/k/a Abu Abdullah a/k/a Abdellah a/k/a Abdullah; Mohammed Amine Akli a/k/a Samir a/k/a Kali Sami a/k/a Elias; Mohrez Amdouni a/k/a Fabio Fusco a/k/a Mohammed Hassan a/k/a Tuale Abu; Chiheb Ben Mohamed Ayari a/k/a Abu Hohem Hichem; Mondher Baazaoui a/k/a Hamza; Lionel Dumont a/k/a Bilal a/k/a Hamza a/k/a Jacques Brougere; Moussa Ben Amor Essaadi a/k/a Dah Dah a/k/a Abdelrahman a/k/a Bechir; Rachid Fehar a/k/a Aminedel Belgio a/k/a Djaffar; Brahim Ben Hedili Hamami; Khalil Jarraya a/k/a Khalil Yarraya a/k/a Aziz Ben Narvan Abdel' a/k/a Amro a/k/a Omar a/k/a Amrou a/k/a Amr; Mounir Ben Habib Jarraya a/k/a Yarraya; Fouzi Jendoubi a/k/a Said a/k/a Samir; Fethi Ben Rebai Masri a/k/a Amor a/k/a Omar Abu a/k/a Fethi Alic; Najib Ouaz; Ahmed Hasni Rarrbo a/k/a Abdallah a/k/a Abdullah; Nedal Saleh a/k/a Iitem; Abdelghani Mzoudi; Gulbuddin Hekmatyar; Imad Mughniyeh; Muhammad Omar; Islamic International Brigade; Special Purpose Islamic Regiment; and Riyadus-Salikhin Recognizance and Sabotage Battalion of Chechen Martyrs, have been designated as supporters and associates of terrorists by the U.S. government, pursuant to Executive Order 13224, based on their material support and sponsorship of, or affiliation with, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons. The claims asserted against these defendants are predicated on the conduct and evidence underlying their designations by the U.S. government, and the additional grounds set forth herein.

66. Defendants Princess Haifa Al-Faisal; Prince Bandar bin Sultan bin Abdulaziz al Saud; Osama Bassnan; Omar Al-Bayoumi; Fahad Al-Thumairy; World Assembly of Muslim Youth; Sheikh Ahmed Salim Swedan; Muhammad Abu-Islam; Abdullah 'Qassim; Hashim Abdulrahman; Jamal Al-Badawi; Mohammed Omar Al-Harazi; Walid Al-Sourouri; Fatha Adbul Rahman; Yasser Al-Azzani; Jamal Ba Khorsh; Ahmad Al-Shinni; Jamil Qasim Saeed; Abu Abdul Rahman; Mohamed Bayazid; Abu Musab Zarqawi; Sheikh Omar Bakri Muhammad; Abdul Fattah Zammar; Ghasoub Al Abrash Ghalyoun a/k/a Abu Musab; Bensayah Belkacem; Sabir Lamar; Wadih El-Hage; Wali Khan Amin Shah; Zacarias Moussaoui; The Taliban; Maulvi Abdul Kabir; Jalil Shinwari; Noor Jalil; Abdel Hussein; Adu Agab; National Islamic Front; Hassan Turabi; Iss El-Din El Sayed; Lashkar Redayan-E-Islami; Ahmad Salah a/k/a Salim; Abd Al-Mushin Al-Libi; Abdul Rahman Khaled Bin Mahfouz; Abdul Rahman Yasin; Abdulla Al Obaid; Abdula Bin Laden; Advice and Reformation Committee; Afghan Support Committee; Al Khaleejia for Export Promotion and Marketing Company; Al-Haramain a/k/a Al-Haramain Foundation; Enaam M. Arnanout; International Development Foundation; International Islamic Relief Organization; International Institute of Islamic Thought; Islamic Cultural Institute of Milan; Jamal Barzinji; Khaled Bin Mahfouz; Mohammed Jamal Khalifa; Mohammed Salim Bin Mahfouz; Muslim World League; National Commercial Bank; Prince Nayef Bin Abdulaziz Al Saud; Prince Sultan Bin Abdulaziz Al Saud; Rabih Haddah; SAAR Foundation; Saudi Sudanese Bank; Al Shamal Islamic Bank ;Sheikh Abu Bdul Aziz Nagi; Sheik Adil Galil Batargy a/k/a Adel Abdul Jalil Batterjee; Suleiman Abdel Aziz Al Rajhi; Taba Investments; Tanzanite King; Ulema Union of Afghanistan; Wadi Al Aqiq; Infocus Tech of Malaysia; Yazid Sufaat of Kuala Lumpur Malaysia; Al-Shaykh Al-Iraqi; Azzam Service Center; Abu Hajer Al Iraqi;

Mohammed Al Faisal Al Saud; Al-Hijrah Construction and Development Limited; Gum
 Arabic Company Limited; Al Shamal For Investment and Development; Saleh Abdullah
 Kamel; Al Baraka Investment and Development; Saudi Dallah Al Baraka Group LLC;
 Islamic Investment Company of the Gulf; Dar-Al-Maal Al Islami; Al-Bir Saudi
 Organization; Mohammad S. Mohammad; Tadamon Islamic Bank; Mustasim Abdel-
 Rahim; National Fund for Social Insurance; Abdul-Rahim Mohammed Hussein; Al Amn
 Al-Dakhili; Al Amn Al-Khariji; Abd Al Samad Al-Ta'ish; Mohamed Sadeek Odeh;
 Abdel Barry; Ahmad Salah a/k/a Salim; Mahdi Chamran Savehi; Mohammed Sarkawi;
 Al Tawhid; Haji Mohamad Akram; Abdallah Omar; Umar Faruq; Abd Al-Rahim Al-
 Nashiri; Turki Al Faisal Al Saud a/k/a Prince Turki; Prince Abdullah Al Faisal Bin
 Abdulaziz Al Saud a/k/a Prince Abdullah; Prince Salman Bin Abdul Aziz Al Saud a/k/a
 Prince Salman; Zouaydi a/k/a Muhammed Galeb Kalaje Zoaaydi a/k/a Abu Talha;
 Mullah Kakshar; Abdulaziz Bin Abdul Rahman Al Saud; Arafat El-Asahi; Haydar
 Mohamed Bin Laden; Mohammed Bin Abdulrahman Al Ariefy; Faisal Group Holding
 Company; Al Faisaliah Group; Bashsh Hospital; Mushayt for Trading Establishment;
 Abdullah Bin Abdul Muhsen Al Turki a/k/a Al Turki; Saudi High Commission a/k/a The
 Saudi High Relief Commission; Abdul Aziz Al Ibrahim a/k/a Al Ibrahim; Tarek Ayoubi;
 Al Anwa; Help African People; Ibrahim Bin Abdul Aziz Al Ibrahim Foundation; Mercy
 International Relief Agency; Islamic Movement of Uzbekistan; Saudi Bin Laden Group;
 Bakr M. Bin Laden; Salem Bin Laden; Saleh Gazaz; Mohammed Bahareth; Abdullah Bin
 Said; Mohammed Nur Rahmi; Tarek M. Bin Laden; Omar M. Bin Laden; Mohammed
 Bin Laden Organization; Saudi Bin Laden International Company; Yeslam M. Bin
 Laden; Global Diamond Resource; Human Concern International Society; Talal
 Mohammed Badkook; Dr. Mohaman Ali Elgari; New Diamond Holdings; M.M.

Badkook Company for Catering & Trading; Al-Mustaqbal Group; National Management Consultancy Center; Al-Rajhi Banking & Investment Corporation; Saleh Abdulaziz Al-Rajhi; Abdullah Sulaiman Al-Rajhi; Khalid Sulaiman Al-Rajhi; Al-Watania Poultry; Mar-Jac Poultry; Mar-Jac Investments, Inc.; Piedmont Poultry; Salim Bin Mahfouz; SNCB Corporate Finance Limited; SNCB Securities Limited in London; SNCB Securities Limited in New York; Saudi Economic and Development Company; Zakat Committee; Red Crescent Saudi Committee; Blessed Relief Foundation; Abdulkarim Khaled Uusuf Abdulla; Abdulrahman Bin Khalid Bin Mahfouz; Al-Birr; Hisham; Hezb-e-Islami; Saif Al Islam El Masry; Syed Suleman Ahmer; Mazin M.H. Bahareth; Shahir Abdulraoof Batterjee; Zahir H. Kazmi; Muzaffar Khan; Soliman J. Khudaira; Jamal Nyrabeh; Ahmad Ajaj; Success Foundation; Abdulrahman Alamoudi; American Muslim Foundation; Mohammed Omeish; Adnan Basha; Mahmoud Jaballah; Arafat El-Ashi; Moro Islamic Liberation Front; Jamal Ahmed Mohammed; Mohammed Khatib; Saudi Joint Relief Committee; Taibah International Aid Association; Islamic African Relief Agency; Tarik Hamdi; Fazez Ahed; Sanabil Al-Khair; Sana-Bell, Inc.; Sanabel Al-Kheer, Inc.; Khaled Nouri; Abdullah M. Al-Mahdi; Tareq M. Al-Swaidan; Abdul Al-Moslah; Salah Badahdh; Hassan A.A. Bahfzallah; M. Yaqub Mirza; Ihab Ali; Samir Salah; Ibrahim Hassabella; Hisham Al-Talib; Abu Sulayman; Ahmed Totonji; Iqbal Yunus; M. Omar Ashraf; Mohammed Jaghli; Muhammad Ashraf; Sherif Sedky; African Muslim Agency; Aradi, Inc.; Grove Corporate, Inc.; Heritage Education Trust; Mena Corporation; Reston Investments, Inc.; Safa Trust; Sterling Charitable Gift Fund; Sterling Management Group; York Foundation; National Development Bank; Dallah Avedco Trans Arabia Co. Ltd.; Omar Al Bayoumi a/k/a Abu Imard; Masjed Al Madinah Al Munawarah a/k/a Masjid Al Madinah Al Munawarah; Aqsa Islamic Bank; Aqeel Al-Aqeel; Mansouri

Al-Kadi; Soliman H.S. Al-Buthe; Perouz Seda Ghaty; Ahmed Ibrahim Al Najjar; Adel Muhammad Sadiq Bin Kazem; Saudi American Bank; Abdulaziz Bin Hamad; Khalil A. Kordi; Rashid M. Al Romaizan; Abdulaziz Bin Hamad Al Gosaibi; Saudi Cement Company in Damman; Omar Sulaiman Al-Rajhi; Arab Cement Company; Zeinab Mansour-Fattouh; Mohammed Chehade; Hazem Ragab; Mohammed Alchurbaji; Mustafa Al-Kadir; Abu Al-Maid; Al Shamal Islamic Bank a/k/a Shamel Bank a/k/a Bank El Shamar; Sulaiman Al-Ali; Khaled Nouri; Muslim World League offices; Abdullah Bin saleh Al-Obaid; Taha Jaber Al-Alwani; International Institute of Islamic Thought; Ibrahim S. Abdullah; Mohammed Bin Faris; Dr. Mahmoud Dakhil; Mohammed Al Faisal Al Saud; Abdul Rahman Al Swailem; Delta Oil Company; Nimir, LLC; Arab Bank, PLC; Dubai Islamic Bank; Nada Management Organization, SA; Ary Group; Islamic Cultural Center of Geneva; Hani Ramadan; The Committee for the Defense of Legitimate Rights; Proyectos Y Promociones Iso; Afamia, SL; Cobis; Abrash Company; Promociones Y Construcciones Tetuan Pricote, S.A.; Contratas Gioma; Eurocovia Obras, S.A.; Proyectos Y Promociones Pardise, S.L.; Proyectos Edispan; Ghasoub Al Abrash; Mustaf Ahmed Al-Hisawi a/k/a Sheik Saeed; Imad Eddin Barakat Yarkas a/k/a Abu Dahdah; Muhammed Galeb Kalaje Zuoyadi a/k/a Abu Talha; Bassam Dalati Satut; Abdalrahman Alarnout Abu Aljer a/k/a Abu obed; Mohammed Khair Al Saqqa a/k/a Abu Al Darda; Ghasoub Al Abrash Ghalyoun a/k/a Abu Musab; Mohammed Ali Sayed Mushayt; Mohammed Hussein Al-Amoudi; Abu Qatada Al-Filistini a/k/a Abu Ismail a/k/a Abu Umar a/k/a Abu Omar Omar a/k/a Abu Umar Takfiri a/k/a Abu Umar umar a/k/a Ali-Samman Uthman a/k/a Omar Mahmoud Uthman a/k/a Umar Uthman; Yassir Al-Sirri a/k/a Ammar; Mohammed Al Massari; Lujain Al-Iman; Ziyad Khaleel; Ibrahim Bah; Abu Zubaydah; Mamdouh Mahmud Salim a/k/a Abu Hajer Al Iraqi; Sheikh

Abdullah Azzam a/k/a Abu Muhammed; Abdullah Samil Bahmadan; Essam Al Ridi; Omar Abu Omar; Mohammed Ali Hasan Al Moayad; Al Farooq Mosque; Yousef Jameel; Ibrahim Muhammed Afandi; Mohammed Bin Abdullah Al-Jomaith; Abdulrahman Hassan Sharbatly; Salahuddin Abduljawad; Ahmed Zaki Yamani; Ahmad Al Harbi; Mohammed Al-Issai; Hamad Hussaini; Abu Rida Al Suri a/k/a Mohammed Loay Bayazid; Saudi Red Crescent; Ahmed Brahim; Abu Musab Al-Zarqawi; Abu Ibrahim Al-Masri; Dar Al Maal Al Islami Trust; DMI Administrative Services, S.A.; Islamic Assembly of North America; Salman Al-Ouda; Safar Al-Hawali; Saleh Al-Hussayen; Sami Omar Al-Hussayen; Muhammed J. Fakihi; Queen City Cigarettes and Candy; Agus Budiman; Al-Baraka Bankcorp, Inc ; Ahmed Ressam; Said Bahaji; Zakariya Essabar, have aided and abetted, conspired with, and provided material support and resources to, defendant al Qaida and/or affiliated FTOs, associations, organizations or persons, as described herein.

II. JURISDICTION

67. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1332(a)(2) (diversity), and 28 U.S.C. § 1350 (Alien Tort Claims Act).

68. The jurisdiction of this Court over defendants Iran, Iraq, Sudan, Syria and Saudi Arabia is invoked pursuant to 28 U.S.C. § 1330, as the claims against those defendants fall within the exceptions to immunity set forth at 28 U.S.C. §§ 1605(a)(2), 1605(a)(5) and 1605(a)(7) (Foreign Sovereign Immunities Act).

69. Venue in this district is proper pursuant to § 408(b)(3) of the Air Transportation Safety and System Stabilization Act, 49 U.S.C. § 40101, and 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1).

III. FACTUAL BACKGROUND

70. On September 11, 2001, nineteen (19) members of the al Qaida terrorist network hijacked four (4) commercial airliners, and used those planes as weapons in a coordinated terrorist attack on the World Trade Center Complex in New York and the Pentagon in Arlington, Virginia (the “September 11th Attack”).

71. The September 11th Attack resulted in the tragic loss of several thousand lives, personal injuries to countless other persons, and property damage on a catastrophic scale, including the complete destruction of the World Trade Center Complex.

72. The September 11th Attack was a direct, intended and foreseeable product of a larger conspiracy among the defendants, to commit acts of international terrorism against the United States, its nationals and allies.

73. The conspiracy among the defendants to commit acts of international terrorism against the United States, its nationals and allies, included the provision of material support and resources to defendant al Qaida and affiliated foreign states, FTOs, persons, organizations, commercial entities and other parties, as discussed herein.

74. Absent the material support and resources provided by the co-defendants, both directly and indirectly, al Qaida would not have possessed the financial resources, physical assets, membership base, technological knowledge, communication skills, and global reach required to conceive, plan and execute the September 11th Attack.

ORIGINS OF AL QAIDA

75. The al Qaida movement has its origins in the “holy war” against the Soviet occupation of Afghanistan. During the 1980s, mujihadeen fighters from throughout the Muslim world came to Afghanistan to fight the Soviet Red Army and defend Afghani Muslims. From the early stages of the conflict, Osama bin Laden provided financial, organizational, and engineering aid to the mujihadeen in Afghanistan, at the behest of the

Kingdom of Saudi Arabia. Together with Abdullah Azzam, bin Laden founded an organization known as the Makhtab al Khidmat (“The Office of Services”), to facilitate the provision of financial and logistical support to the mujihadeen.

76. Throughout the conflict with the Soviet Red Army, the Makhtab al Khidmat worked closely with a number of purported charities and relief organizations to provide travel documents, funds, transportation, training, facilities, arms, physical assets and other logistical support to the mujihadeen. In collaboration with one another, these ostensible charities and relief organizations established a vast financial and logistical infrastructure to support the mujihadeen opposition to the Soviet occupation of Afghanistan. The ostensible charities that operated within that infrastructure included the Muslim World League, International Islamic Relief Organization, Benevolence International Foundation a/k/a Lajnat al-Birr al-Islamiyya, and the Saudi Red Crescent, among others.

77. Shortly before the Soviet Army withdrew from Afghanistan in 1989, Osama bin Laden became determined to spread the jihadist movement to regions outside of Afghanistan, and to wage war with the United States of America, which he believed to be the true enemy of Islam. In furtherance of that objective, bin Laden established al Qaida. At the time of its establishment, al Qaida had only fifteen (15) members. Over the course of the next thirteen- (13) years, al Qaida grew to include several thousand members, associates, and supporters, with operational and logistical cells in every corner of the globe. By September 11, 2001, al Qaida also served as an umbrella organization for other like minded terrorist groups, through which it frequently conducted terrorist attacks.

78. Using the system developed to support the mujihadeen fighters in Afghanistan as a model, al Qaida relied, from its inception, on a complex infrastructure of ostensible charities, relief organizations, mosques, banks, financial institutions, wealthy sponsors, and for-profit enterprises to fuel its phenomenal development and global expansion. This international support infrastructure sustained al Qaida when it moved from Afghanistan to the Sudan in 1991, and when it was forced to relocate back to Afghanistan in 1996. Absent this international support infrastructure, al Qaida would have remained a regional extremist organization, without the capacity to conduct acts of international terrorism.

GENERAL ALLEGATIONS COMMON TO ALL CHARITY DEFENDANTS

79. Ostensible charitable organizations, and in particular, Islamic charities under the control of the Kingdom of Saudi Arabia, have played a singularly important role in al Qaida's development and pursuit of its perverse ambitions. These "charities" have served as the primary vehicle for raising, laundering and distributing funds on behalf of al Qaida from its inception. In addition, these charities have provided arms, false travel documentation, physical assets and logistical support to al Qaida. In many cases, senior members of the al Qaida movement have served as senior representatives of the charities, and used their employment status with the charities to shield their direct involvement in planning, coordinating, organizing, funding and conducting acts of international terrorism. Facilities of the charities, including the branch offices, have served as safe houses for al Qaida operatives, and bases for planning and launching operations. These charities are fully integrated components of al Qaida's organizational structure, and are actively involved at every level of al Qaida's operations, from recruitment and training of new members, to the planning and conduct of terrorist attacks.

80. In describing the integral role of charitable organizations in al Qaida's global operations, the United Nations Security Council Committee concerning al Qaida and the Taliban recently stated:

From its inception, al-Qaida has relied heavily on charities and donations from its sympathizers to finance its activities. Charities provide al-Qaida with a very useful international channel for soliciting, collecting, transferring and distributing the funds it needs for indoctrination, recruitment, training, and logistical and operational support. These funds are often merged with and hidden among funds used for other legitimate humanitarian or social programs. Al-Qaida supporters and financiers have also established front charity networks whose main purpose is to raise and deliver funds to al-Qaida. The roots of these charity networks stem from the anti-Soviet Jihad in Afghanistan during the last 1980s. During that time, al-Qaida could draw on a number of state-assisted charities and other deep pocket donors that supported the anti-Soviet cause.

Today, al-Qaida continues to rely heavily on those charities to facilitate and mask the collection and movement of its funds.

81. The longstanding involvement of purported charities in the sponsorship of Islamic terrorist organizations is further evidenced by a recently declassified 1996 Report of the Central Intelligence Agency. In that report, the author states as follows:

Of the 250 local and foreign-based non-governmental charitable organizations (NGOs) that operate worldwide, over 50 are international Islamic NGOs conducting humanitarian work. Available information indicates that approximately 1/3 of the Islamic NGOs support terrorist groups or employ individuals who are expected of having terrorist connections.

82. International investigations since September 11, 2001 have further exposed the pervasive involvement of purported charitable organizations in the al Qaida movement. As a result of those investigations, the United States Government has

designated the following purported charities as sponsors and supporters of al Qaida or an affiliated FTO under the Executive Order 13224 designation program: al Haramain Foundation, Benevolence International Foundation, Blessed Relief (Muwafaq) Foundation, Holy Land Foundation for Relief and Development, Global Relief Foundation, al Rashid Trust, Wafa Humanitarian Organization and Revival of Islamic Heritage Society. Investigations regarding the terrorist activities of a number of additional ostensible charities, including the Muslim World League, World Assembly of Muslim Youth and International Islamic Relief Organization, are continuing.

83. Absent the pervasive and critical infrastructure and support provided by the charity defendants, as further described herein, al Qaida would have forever remained a regional extremist organization, without the capacity to conduct large scale terrorist attacks on a global scale.

BENEVOLENCE INTERNATIONAL FOUNDATION

84. Defendant Benevolence International Foundation (BIF) is an ostensible charity, with offices located throughout the World. BIF is the successor in interest to Lajnat al Biarr al Islamiyya, which was established by defendant Adel Batterjee in 1987 in Pakistan. BIF is a subsidiary body of the Muslim World League, and has frequently shared common officers and directors with that organization.

85. BIF is an agency, instrumentality and organ of the Kingdom of Saudi Arabia. The Kingdom controls and directs BIF operations, appoints and terminates BIF personnel, provides BIF with virtually all of its funding, determines how funds will be distributed throughout the World, and otherwise stringently controls BIF's operations. In many countries, BIF conducts operations from the local Saudi embassy, under the supervision of the embassy's Islamic Affairs Division.

86. BIF has long acted as a fully integrated component of al Qaida's logistical and financial support infrastructure, and provided material support and resources to al Qaida and affiliated FTOs.

87. On November 19, 2002, the United States government designated BIF, and several related entities, as financiers of terrorism pursuant to Executive Order 13224. The Treasury Department press release relating to the designation stated as follows:

Benevolence International Foundation ("BIF") is a US tax-exempt not-for-profit organization whose stated purpose is to conduct humanitarian relief projects through the World. BIF was incorporated in the State of Illinois on March 30, 1992. Although BIF is incorporated in the United States, it operates around the World, in Bosnia, Chechnya, Pakistan, China, Ingushetia, Russia, and other nations. BIF operates as Benevolence International Fund in Canada and as both Bosanska Idealna Futura in Bosnia.

Enaam Arnaout, BIF's chief executive officer and a member of the Board of Directors, recently was indicted in the United States for operating BIF as a racketeering enterprise and providing material support to organizations, including al Qaida that are engaged in violent activities.

Substantial evidence documents the close relationship between Arnaout and Usama bin Laden, dated from the mid-1980s. An article in the Arab News from 1998, reporting on bin Laden's activities at the "al Masada" mujahideen camp in Afghanistan, included a photograph of Arnaout and bin Laden walking together. In a March 2002 search of BIF's offices, Bosnia law enforcement authorities discovered a host of evidence linking Arnaout to bin Laden and al Qaida. Among the files were scanned letters between Arnaout and bin Laden, under their aliases.

In one handwritten letter, bin Laden indicates that Arnaout is authorized to sign on bin Laden's behalf.

Various documents also establish that Arnaout worked with others – including members of al Qaida – to purchase rockets, mortars, rifles, and offensive and defensive bombs, and to distribute them to various mujahideen camps, including camps operated by al Qaida.

Arnaout claimed to the Chicago Tribune last winter that he did not know bin Laden personally, that he had never been to the “al Masada” camp (at which he had been photographed walking with bin Laden), and that he was working in a restaurant in the Persian Gulf area during the relevant time frame. BIF’s counsel later acknowledged in court that “it would appear that the nature of [Arnaout] contacts [with bin Laden] may have been of a deeper nature than what he described to the Tribune.

BIF has also provided additional support for and has been linked in other ways to al Qaida and its operatives. First, BIF lent direct logistical support in 1998 to Mamdouh Mahmud Salim, a bin Laden lieutenant present at the founding of al Qaida. Salim was indicted for conspiring to kill U.S. nationals. Testimony at the 2001 trial of United States v. bin Laden, et al., implicated Salim in efforts to develop chemical weapons on behalf of al Qaida in the 1990s. As early as 1992, Salim and bin Laden made efforts to develop conventional weapons and to obtain nuclear weapons components. BIF is also linked to Mohamed Loay Bayazid, who was implicated in the US embassy bombing trial for his efforts, approved by Salim, to obtain weapons components on behalf of bin Laden in 1993 – 1994. Bayazid’s driver’s license application, dated September 12, 1994, identifies his address as the address of BIF’s Illinois office. In the late 1990s, Saif al Islam el Masry, a member of al Qaida’s Maglis al Shura (consultation counsel), served as an officer in BIF’s Chechnya office.

88. On January 6, 2003, federal prosecutors filed a Santiago proffer in the criminal prosecution of Enaam Arnaout referenced above. The evidentiary proffer, which is incorporated herein by reference, details at length the pervasive involvement of BIF, and of its executives and employees, in sponsoring al Qaida’s global operations, describing the provision of material support and sponsorship to al Qaida as BIF’s “core mission.”

89. As set forth in greater detail in the Santiago proffer, BIF materially supported al Qaida and al Qaida affiliated militants in Afghanistan, Sudan, Bosnia-Herzegovina, Chechnya and other areas. For a period of more than 15 years, BIF

representatives used the cover of their employment with BIF to shield their direct involvement in providing material support to Osama bin Laden, al Qaida, Gulbuddin Hekmatyar and Hezb e Islami. The support provided by BIF included purchasing large quantities of weapons, operating radio communications, providing physical assets and false travel documents to al Qaida fighters, and sponsoring al Qaida camps throughout the World.

90. BIF worked closely with several other purported charities, including the World Assembly of Muslim Youth, Muslim World League, International Islamic Relief Organization, and Al Haramain Foundation, in connection with its efforts to sponsor al Qaida's activities.

91. Founding members of al Qaida, including Enaam Arnaut, Wa'el Julaidan, Abu Rida al Suri (Mohammed Loay Bayazid), and Abu Hajer al Iraqi (Mandouh Salim), have served as officials of BIF.

92. In 1990, while Enaam Arnaout was ostensibly working for BIF, he participated with other al Qaida members in the purchase of weapons for al Qaida, including AK assault rifles and mortar rounds. These weapons were ultimately delivered to al Qaida camps within Afghanistan, under Enaam Arnaout's supervision.

93. In 1991, Osama bin Laden decided to relocate al Qaida's leadership structure and principal training camps to the Sudan, under the protection of the ruling National Islamic Front regime. Al Qaida remained in Sudan for a period of five (5) years, during which it worked closely with the National Islamic Front, the Sudanese Intelligence Service, and the Popular Defense Force.

94. When the al Qaida leadership structure relocated to Sudan in 1991, BIF immediately opened an office in the Sudan, to support al Qaida in its new location. BIF's

sponsorship of al Qaida in the Sudan mirrored how it had worked with al Qaida in Afghanistan prior to 1991.

95. In 1992 the al Qaida leadership, including Osama bin Laden, made a strategic decision to become deeply involved in the ongoing ethnic conflict in the Balkan region, in order to establish relationships and a base of operations to support future al Qaida attacks in Europe. Towards that objective, al Qaida sent its mujihadeen fighters to Bosnia, to train and fight alongside members of the Bosnian Muslim Army.

96. From the outset, BIF played a pivotal role in al Qaida's efforts to establish operations in Bosnia. BIF provided food, clothing, money and communications' equipment to al Qaida affiliated fighters in Bosnia. BIF facilitated the movement of hundreds of al Qaida mujihadeen fighters into the region, by falsely representing to authorities that those terrorists would be working as BIF relief workers.

97. Within the Muslim world, BIF made little effort to conceal its support for al Qaida's operations in Bosnia. In its Arabic language fundraising appeals, BIF advertised itself as a "trustworthy hand for the support of [both] the Mujahideen and refugees" in Bosnia. Similarly, documents recovered during a federal raid of BIF's Illinois office in December 2001 included handwritten Arabic notations explaining that its headquarters in Croatia was established "for relief operations in support of Jihad in Bosnia/Herzegovina...contribute with your Mujahideen brothers to repel the Crusader/Zionist attack on Muslim lands."

98. The federal raid of BIF's Illinois office uncovered the following additional documents confirming the scope and extent of BIF's sponsorship of al Qaida's efforts in Bosnia: a receipt dated July 21, 1994, from the "Black Swans" Bosnian Muslim commando brigade for 300 blankets and 200 pairs of boots obtained from BIF; a receipt

from the BiH Army dated June 3, 1994, for 2000 uniforms, 2000 pairs of shoes, and 10 “mass communication stations” donated by BIF to “this military unit;” a request dated December 31, 1994, from the Bosnian military for a combat ambulance, later delivered as promised in January 1995; and, a memorandum to BIF director Enaam Arnaout, dated November 17, 1995 describing the recent contribution of 200 tents to the Muslim army.

99. In March 2002, Bosnian police raided BIF’s Sarajevo offices. During the raid, investigators recovered extensive documentation relating to al Qaida’s operations from BIF’s computer system, including internal al Qaida documents detailing the contributions of various individuals and purported charities to the terrorist organization’s development and expansion. As is discussed in greater detail in the U.S. government’s Santiago proffer in the Arnaout prosecution, the computer system housed a file labeled “Tareekh Osama” (“Osama’s History”), containing scanned images of documents chronicling the formation of al Qaida. BIF also maintained scanned documents in a voluminous “Tareekh al Musadat” file, detailing the history of al Qaida’s Al Masada training camp, as well as an “Al Jabal” file containing daily reports of activities at the Al Jabal camp, operated by the al Qaida affiliated Hizb e Islami.

100. The documents contained within the aforementioned files confirm the long term and global participation of BIF, MWI, Rabita Trust, and other purported charities in al Qaida’s support infrastructure.

101. Within the Tareekh Osama file, investigators also uncovered a document called the “Golden Chain.” According to officials of the U.S. government, this document is “a list of people referred to within al Qaida” as wealthy donors to the al Qaida movement. Among the individuals identified in the Golden Chain as al Qaida’s principal sponsors are defendants Suleiman al-Rashid, Abdulkader al Bakri a/k/a Abdel Qader

Bakri, Bakr Bin Laden, Youseff Jameel, Ibrahim Muhammad Afandi, Saleh Abdullah Kamel, Suleiman Abdulaziz al Rajhi, Mohammad bin Abdullah al-Jomaih, Abulrahman Hassan Sharbalty, Ahmed Mohamed Naghi, Khalid Bin Mahfouz Adel Faqih a.k.a Abdel Qader Faqeeh, Salahuddin Abduljawad a/k/a Salah al-Din Abdel Jawad, Ahmad Turki Yamani a/k/a Ahmed Zaki Yamani, Abdul Hadi Taher, Ahmad al Harbi Mohammed al-Issai, Hamad al Hussaini, Mohamed Omar and al Kuwait.

102. In conjunction with the March raid of BIF's regional headquarters in Sarajevo, Bosnian police detained its manager, Munib Zahiragic, a former intelligence officer affiliated with the Bosnian Foreign Ministry. Zahiragic turned over secret documents regarding al Qaida activities in Bosnia, including transcripts of communications between BIF management and senior commanders of al Qaida based in Afghanistan. The Bosnian officials also discovered firearms, ski masks, numerous military manuals on topics including small arms and explosives, fraudulent passport materials, and photographs of Osama bin Laden during the raid.

103. BIF played an equally important role in the infrastructure supporting al Qaida's activities in Chechnya. Recognizing that the best way to transfer supplies into Chechnya was through Azerbaijan, BIF established a branch office in Baku, Azerbaijan to serve as a conduit for military supplies to al Qaida militants in Chechnya. Al Qaida lieutenant Saif ul Islam al Masri (a/k/a Abu Islam al Masri) served as BIF's charge d'affaires in the Chechen capital of Grazni, at the end of the supply chain. Saif ul Islam was a member of al Qaida's military committee and had graduated from an expert training course in explosives conducted by the Iranian backed Hezbollah terrorist group in Southern Lebanon. Saif also trained Somali Muslim militiamen to shoot down U.S. helicopters during the United Nations' humanitarian mission in the Horn of Africa in the